

2120 - Served  
2220 - Not Served  
2320 - Served By Mail  
2420 - Served By Publication  
SUMMONS

2121 - Served  
2221 - Not Served  
2321 - Served By Mail  
2421 - Served By Publication  
ALIAS - SUMMONS

CCG N001-10M-1-07-05 ( )

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT \_\_\_\_\_ LAW \_\_\_\_\_ DIVISION \_\_\_\_\_

(Name all parties)

HAYN PILES

v.

TARGET CORPORATION

## SUMMONS

2007L007223  
CALENDAR ROOM 1  
FILE 200802  
20080212 LIBRARY

No. \_\_\_\_\_

Please Serve:  
Target Corporation  
c/o Reg. Agt.  
CT Corporation System  
208 S. LaSalle St. Suite 814

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- ☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602
- |   |   |   |
|---|---|---|
| <input type="checkbox"/> District 1 - Skokie<br>5600 Old Orchard Rd<br>Skokie, IL 60077       | <input type="checkbox"/> District 3 - Rolling Meadows<br>2121 Euclid<br>Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood<br>1500 Maybrook Ave.<br>Maywood, IL 60153          |
| <input type="checkbox"/> District 5 - Bridgeview<br>10220 S. 76th Ave<br>Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham<br>16501 S. Kedzie Pkwy<br>Markham, IL 60426        | <input type="checkbox"/> Child Support<br>28 North Clark St., Room 200<br>Chicago, Illinois 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 21008

Name: Tod H. Allswang

Atty. for: Hay Piles

Address: 308 LaSalle Suite 2126

City/State/Zip: Chicago, IL 60602

Telephone: (312) 468-2110

Service by Facsimile: Transmission will be accepted at: \_\_\_\_\_

WITNESS: \_\_\_\_\_

Clerk of Court

Date of service: \_\_\_\_\_

(To be inserted by officer on copy left with defendant  
or other person)

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

EXHIBIT

2

**CT CORPORATION**  
A WollersKluwer Company

**Service of Process  
Transmittal**

07/31/2007

Log Number 512452995



**TO:** Carter Leuty  
Target Corporation  
1000 Nicollet Mall  
Minneapolis, MN, 55403-

**RE:** Process Served in Illinois

**FOR:** Target Corporation (Domestic State: MN)

Recd from T. Legal on 8/6/07  
Forwarded to DP on 8/6/07  
By Zlee Adjuster Scott R.  
Claim No. 000650017E

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

**TITLE OF ACTION:** Irma Pita, Pltf. vs. Target Corporation. Drt.  
**DOCUMENT(S) SERVED:** Summons, Complaint  
**COURT/AGENCY:** Cook County Circuit Court - Cook County Department - Law Division, IL  
Case # 2007L007223  
**NATURE OF ACTION:** Personal Injury - Slip/Trip and Fall - 06/21/2006 - 800 Broadview Village Square -  
Broadview IL  
**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Chicago, IL  
**DATE AND HOUR OF SERVICE:** By Process Server on 07/31/2007 at 11:30  
**APPEARANCE OR ANSWER DUE:** Within 30 days, not counting the day of service  
**ATTORNEY(S) / SENDER(S):** Tod M. Allswang  
30 North LaSalle Street  
Suite 2128  
Chicago, IL, 60602  
312-346-8210  
**ACTION ITEMS:** SOP Papers with Transmittal, via Fed Ex 2 Day, 798731055746  
**SIGNED:** C T Corporation System  
**PER:** Tawana Carter  
**ADDRESS:** 208 South LaSalle Street  
Suite 814  
Chicago, IL, 60604  
312-345-4336  
**TELEPHONE:**

RECEIVED ON 08/02/07 AT 12:30  
VIA FedEx FORWARDED ON  
08/02/07 AT 12:30 TO  
Sedgwick BY Dawn Royal

Page 1 of 1 / DS

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of the package only, not of its contents.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

IR: 1711, 1611, 1511.

Plaintiff.

**TARGET CORPORATION**  
a foreign corporation

Defendant

) Case No.

2007L007323  
CALENDAR ROOM B  
TIME 00:00  
Premises Liability

1 611 6:00  
6:30

## COMPLAINT AT LAW

NOW COMES the Plaintiff, IRMA PITA, by and through her attorneys, BRIAN J. McMANUS & ASSOCIATES, LTD., and as and for her complaint against the Defendant, LARGELY CORPORATION, a foreign corporation, states as follows:

1 That on or about June 21, 2006 and at all times herein relevant the Defendant,  
 2 TARGET CORPORATION, owned, operated, maintained, leased and controlled a retail store  
 3 located at 800 Broadview Village Square, in the city of Broadview, County of Cook and State of  
 4 Illinois.

That at the aforesaid time and place, the Plaintiff, IRMA PITA, was lawfully on said premises for the purpose of purchasing goods

...in the exercise of  
ordinary care for her own personal safety and the safety of others nearby

4 That at all times herein relevant, it was the duty of the Defendant, TARGET  
5 CORPORATION, its agents, servants and employees to exercise ordinary care in the ownership,  
6 operation and maintenance of the aforesaid retail store and premises so as to provide a reasonably  
7 safe walk-way for all persons lawfully on said premises.

5 That notwithstanding its duty aforesaid the Defendant, TARGET CORPORATION by and through its agents, servants and/or employees was guilty of one or more of the following careless and negligent acts and/or omissions to act:

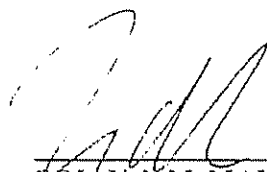
- a Carelessly and negligently failed to adequately and properly inspect the floor of its store and aiseways which were open to the public to keep them free of any foreign debris and other slippery substances;
- b Carelessly and negligently failed to maintain adequate procedures for inspecting and maintaining the aforesaid floor and aisles so as to make sure the same were free of any foreign debris and other slippery substances;
- c Carelessly and negligently failed to warn customers including the Plaintiff of the presence of foreign debris and other slippery substances on the floor and aisles when they knew or should have known that it constituted a dangerous and hazardous condition for persons lawfully on said premises;
- d Carelessly and negligently failed to remove in a timely fashion foreign debris and other slippery substances from the floor and aisles at said store when they knew or should have known that it constituted a dangerous and/or hazardous condition;

6 That as a direct and proximate result of one or more of the foregoing negligent acts and/or omissions to act of the Defendant, TARGET CORPORATION, by and through its agents, servants and employees, the Plaintiff, IRMA PITA, did then and there sustain severe and permanent injuries both externally and internally.

7 That by reason of said personal injuries the Plaintiff, IRMA PITA, has and will be hindered and prevented from attending to her usual duties and affairs and has lost and will in the future lose the value of that time as aforementioned. Plaintiff also suffered great pain and anguish both in mind and body and will in the future continue to suffer the

and Plaintiff further expended and became liable for and will expend and become liable for large sums of money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE the Plaintiff, IRMA PITA, by and through her attorneys, BRIAN J. McMANUS & ASSOCIATES, LTD., prays for judgment against the Defendant, TARGET CORPORATION, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) plus the costs of this suit.



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BRIAN J. McMANUS & ASSOCIATES, LTD.  
Attorney for Plaintiff

BRIAN J. McMANUS & ASSOCIATES, LTD.  
30 N. LaSalle Street, Suite 2126  
Chicago, IL 60602  
(312) 346-8210  
#21608

FROM: Dawn Schulz (612) 616-4336  
Chicago SDP Team  
208 South LaSalle Street  
Suite 811  
Chicago, IL 60604



FedEx Revenue Barcode

**Carter Leuty (612) 696-6782**  
**Target Corporation**  
**1000 Nicollet Mall**

CAD#: 8323339  
SHIP DATE: 31JUL07  
WEIGHT: 1 LB

**Minneapolis, MN 55403**

Ref: SDP 0406500/6 12452945/Dawn Schulz



DELIVERY ADDRESS (FedEx-EDR)

**\*\* 2DAY \*\***

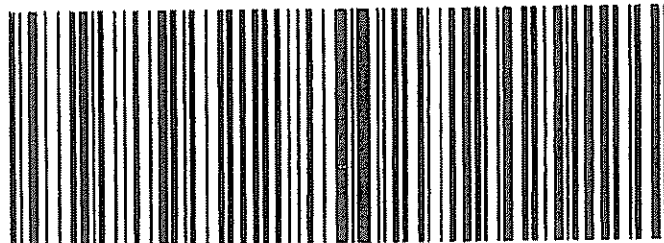
TRK #: 7987 3105 5746

FORM  
0201

**MSP**

**55403 MN-US**

**SE MICA**



**THU**

**A1**

Deliver by  
**02AUG07**

CL5062907

## Calendar Motion Courtrooms Case Management Order

CCL N601-100M-6/10/04

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

PITA

Plaintiff(s)

v.

TARGET

Defendant(s)

Case No. 07 6007223

Motion Call " " Line #:

**MASTER CALENDAR MOTION COURTROOMS CASE MANAGEMENT ORDER**

(Please check off all pertinent paragraphs and circle proper party name.)

- (8230) X 1. Category #1 (18 Month Discovery) (8232) \_\_\_\_\_ 1a. Category #2 (28 Month Discovery)
- (4296) X 2. Written discovery & 213(f)(1) and (2) disclosures to be completed by 12/20/07 ;
- (4218) X 3. Oral Discovery & 213(f)(1) and (2) depositions to be completed by 2/27/08 ;
- (4218) \_\_\_\_\_ 4. Treating physicians depositions to be completed by \_\_\_\_\_ ;
- (4288) \_\_\_\_\_ 5. Subpoenas for treating physicians depositions to be issued by \_\_\_\_\_ ;
- (4296) \_\_\_\_\_ 6. \_\_\_\_\_ shall complete outstanding written discovery by \_\_\_\_\_ ;
- (4218) \_\_\_\_\_ 7. \_\_\_\_\_ shall be presented for deposition by \_\_\_\_\_ ;
- (4206) \_\_\_\_\_ 8. Plaintiff/Defendant/Add. Party shall answer 213 (f)(3) interrogatories by \_\_\_\_\_ ;
- (4218) \_\_\_\_\_ 9. Plaintiff's 213(f)(3) witnesses to be deposed by \_\_\_\_\_ ;
- (4218) \_\_\_\_\_ 10. Defendant's 213(f)(3) witnesses to be deposed by \_\_\_\_\_ ;
- (4218) \_\_\_\_\_ 11. Additional party's 213(f)(3) witnesses to be deposed by \_\_\_\_\_ ;
- (4619) \_\_\_\_\_ 12. The matter is continued for subsequent Case Management Conference on APRIL 3, 2008  
at 9:15 AM/PM in Room 2203 for:
- (A) \_\_\_\_\_ Proper Service (B) \_\_\_\_\_ Appearance of Defendants (C) \_\_\_\_\_ Case Value
- (D) \_\_\_\_\_ Pleading Status (E) X Discovery Status (F) \_\_\_\_\_ Pre-Trial/Settlement
- (G) \_\_\_\_\_ Other: \_\_\_\_\_

- (4005) \_\_\_\_\_ 13. Case is dismissed for want of prosecution. (4040) \_\_\_\_\_ The case is voluntarily dismissed under 735 ILCS 5/2-1009.

**NOTICE:**

- \* Failure of any party to comply with this Case Management Order will be a basis for Rule 219(c) sanctions.
- \* Failure of any party to enforce this Case Management Order will constitute a waiver of such discovery by that party.
- \* All cases arriving on the Trial Call in Courtroom 2005 must have all discovery in Lines 2 through 11 completed.
- \* A copy of this order is to be sent to each party by his/her counsel within 10 (ten) days of the initial Case Management Date.

Atty. No.: 30473

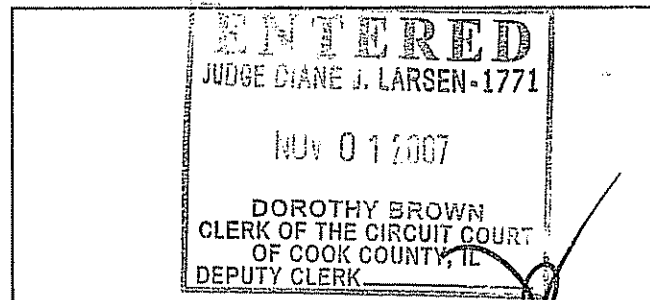
Name: HENNESSY, ROACH

Atty. for: DEFENDANT

Address: 140 S DEARBORN

City/State/Zip: CHICAGO IL 60603

Telephone: (312) 556-5310



Judge's Stamp

ENTERED:

Judge

Judge's No.